

EXHIBIT J

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF JOSEPH PESCE

I, Joseph Pesce, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at One World Trade Center when the terrorist attacks of the World Trade Center Towers occurred.

4. As was established in my claims to the September 11th Victim Compensation Fund, I was employed as a maintenance worker for ABM Engineering Services at One World Trade Center on September 11, 2001. I was on a break in the 7th floor break room when I felt the building shake. I ran down seven flights of stairs, and walked north to Penn Station.

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injury(ies) on September 11, 2001: heel and knee injuries and hearing loss.

7. I suffer from severe PTSD following the 9/11 attacks and am receiving Social Security Disability as a result. I was present at the World Trade Center during the 1993 bombing, as well. When I escaped from One World Trade Center on 9/11, I saw debris falling and witnessed people jumping from the buildings and charred body parts. I saw a giant fireball when the second plane hit and at that point began running for my life. In early 2002, I traveled to Florida with the intention of committing suicide.

8. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks. I am unable to travel to New York City anymore and being in large crowds or hearing loud noises, such as thunder, causes me hours of anxiety and stress.

9. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim (Claim Numbers 212-003562 and VCF 0011227) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 17th day of January 2020.



Joseph Pesce

Exhibits Filed Under Seal